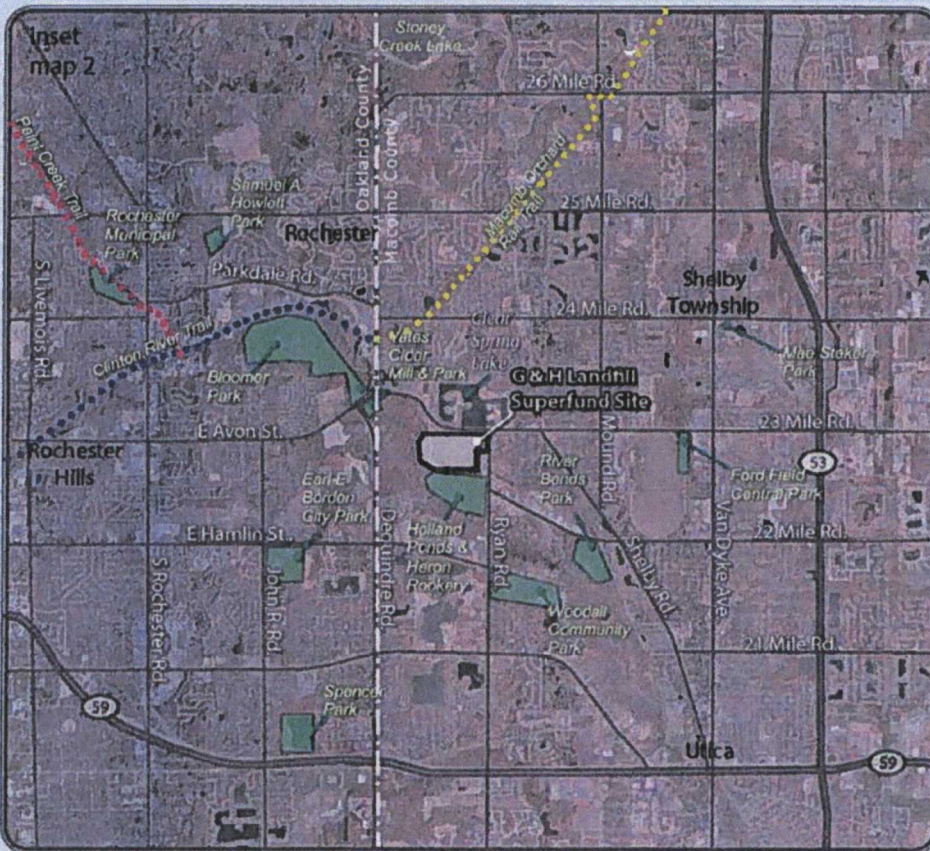


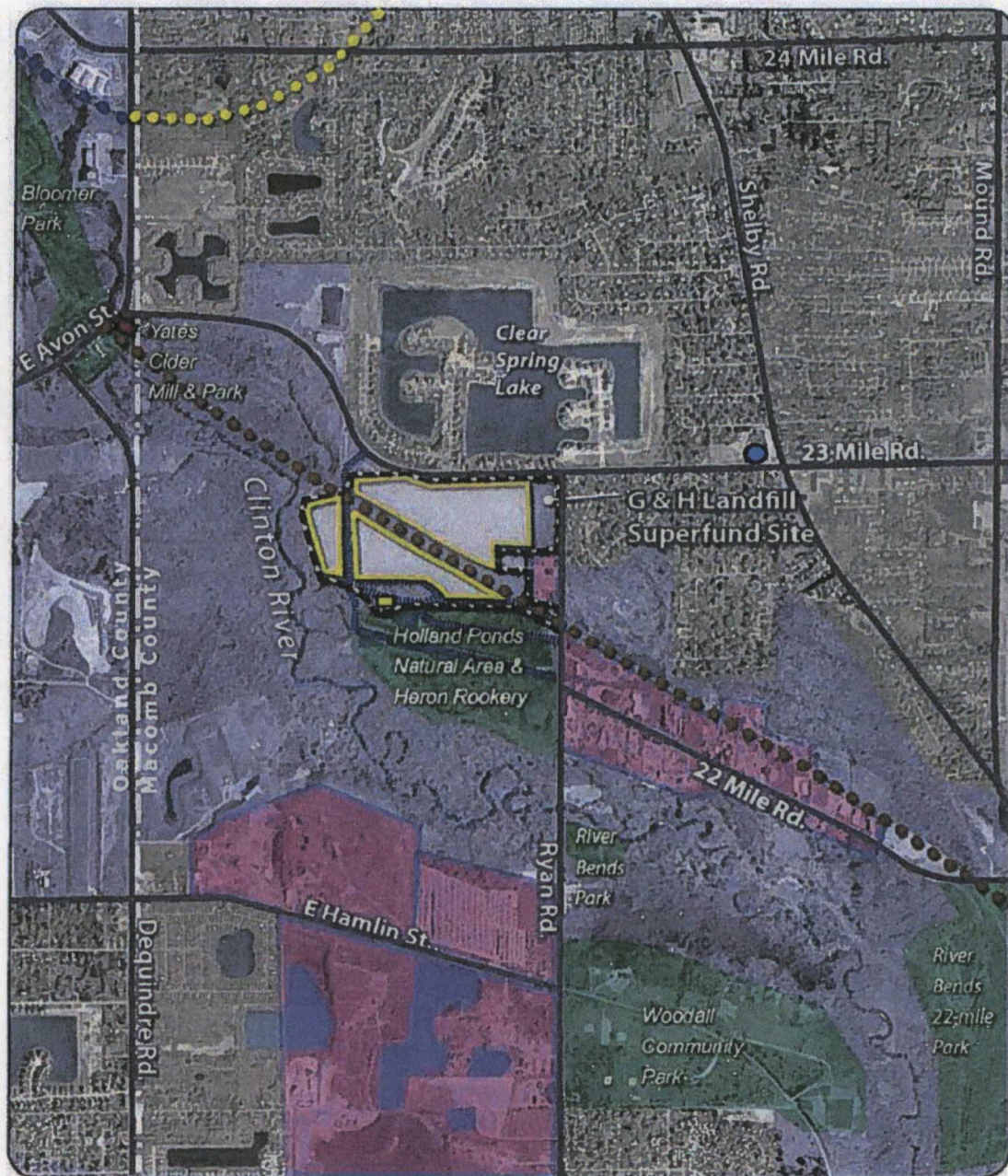


468176

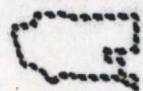
Attachment 1 Site Map



Attachment 2 Map of G & H Landfill Superfund Site and Surroundings



Key



G&H Landfill
Boundary Line



G&H Landfill
Containment
Cells (phases I-III)



G&H Landfill Water
Treatment Facility



Rail Line
(not in use)



Gravel Road



Clinton
River Trail



Macomb
Orchard Trail



Residential
Areas



Industrial
Land Uses

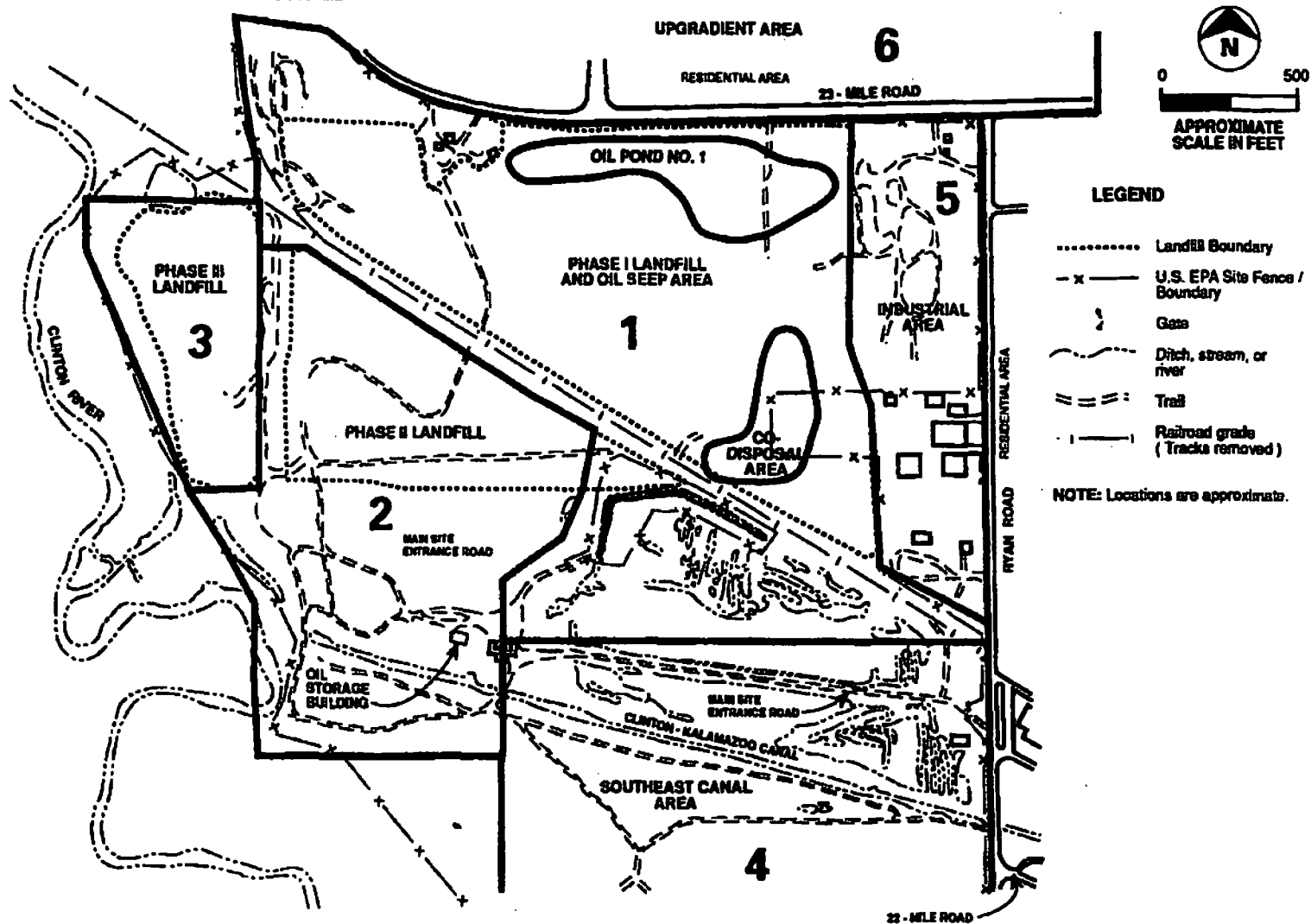


Parks and
Recreation



Elementary
School

GLO5561.RI SITE AREAS 6-6-90 mms

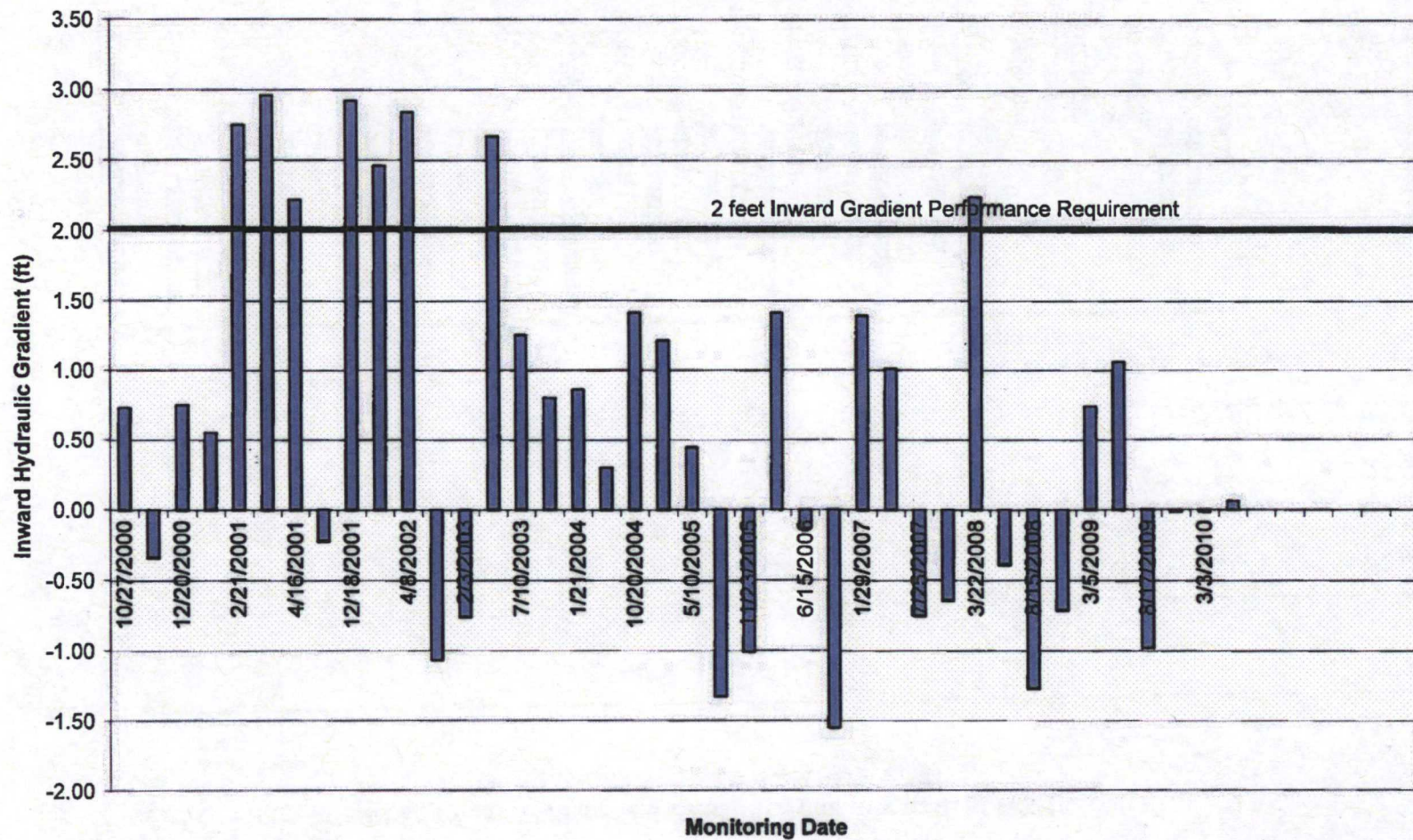


Attachment 3. Site Areas

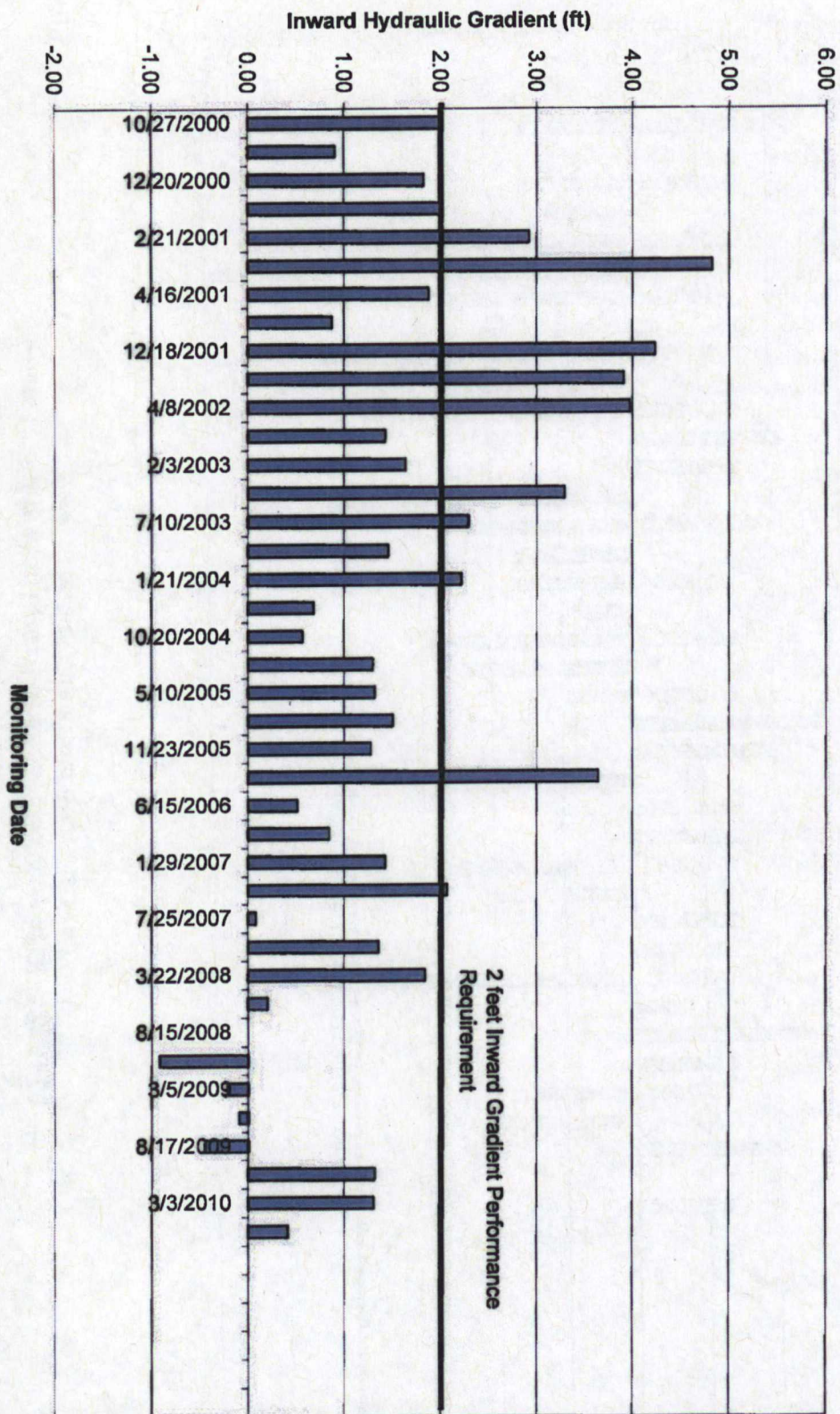
Attachment 4

MDEQ Data Analysis Charts and Tables

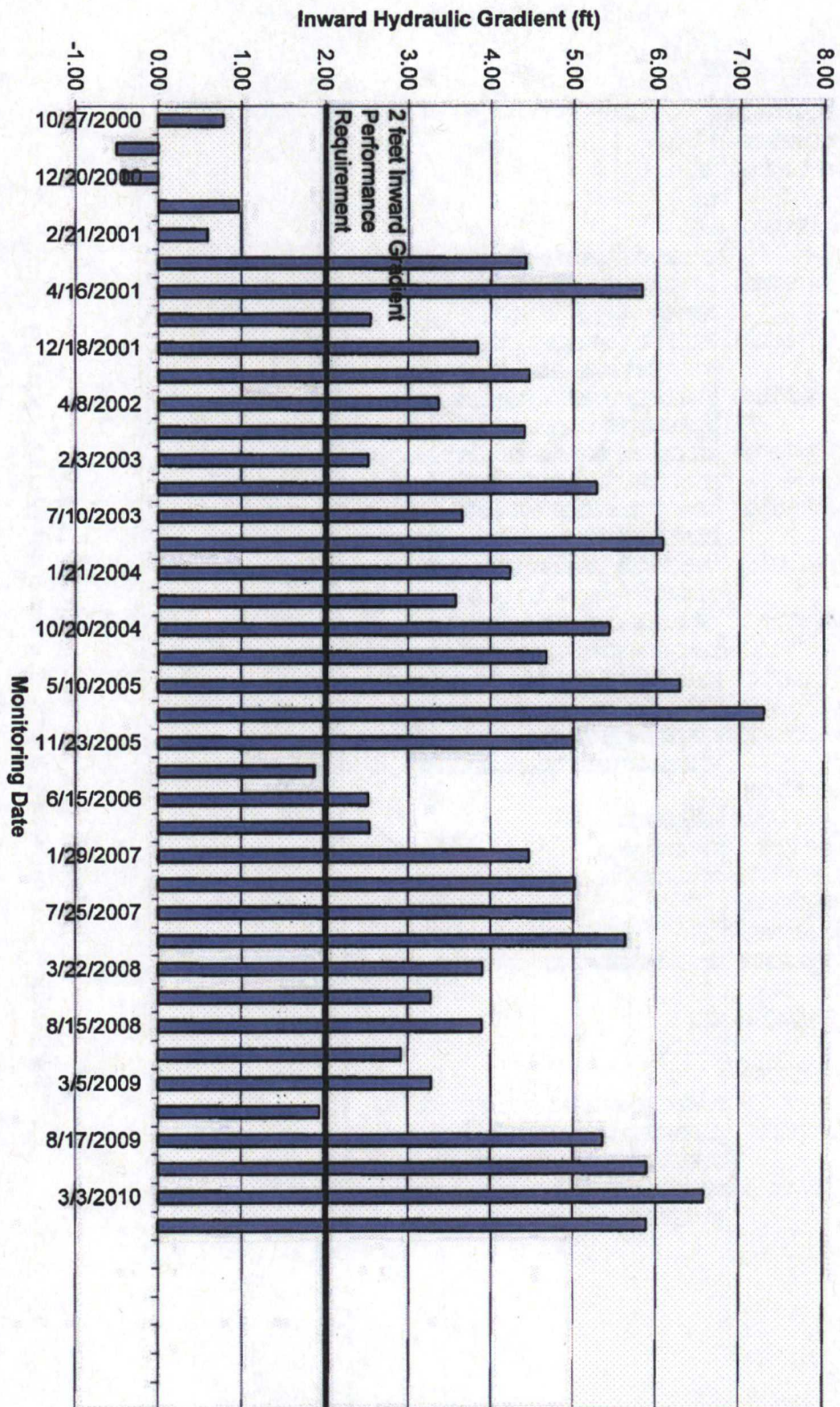
**Chart 1: Slurry Wall Inward Gradient Summary at GH-52/GH-53
G&H Landfill Superfund Site, Utica, MI**



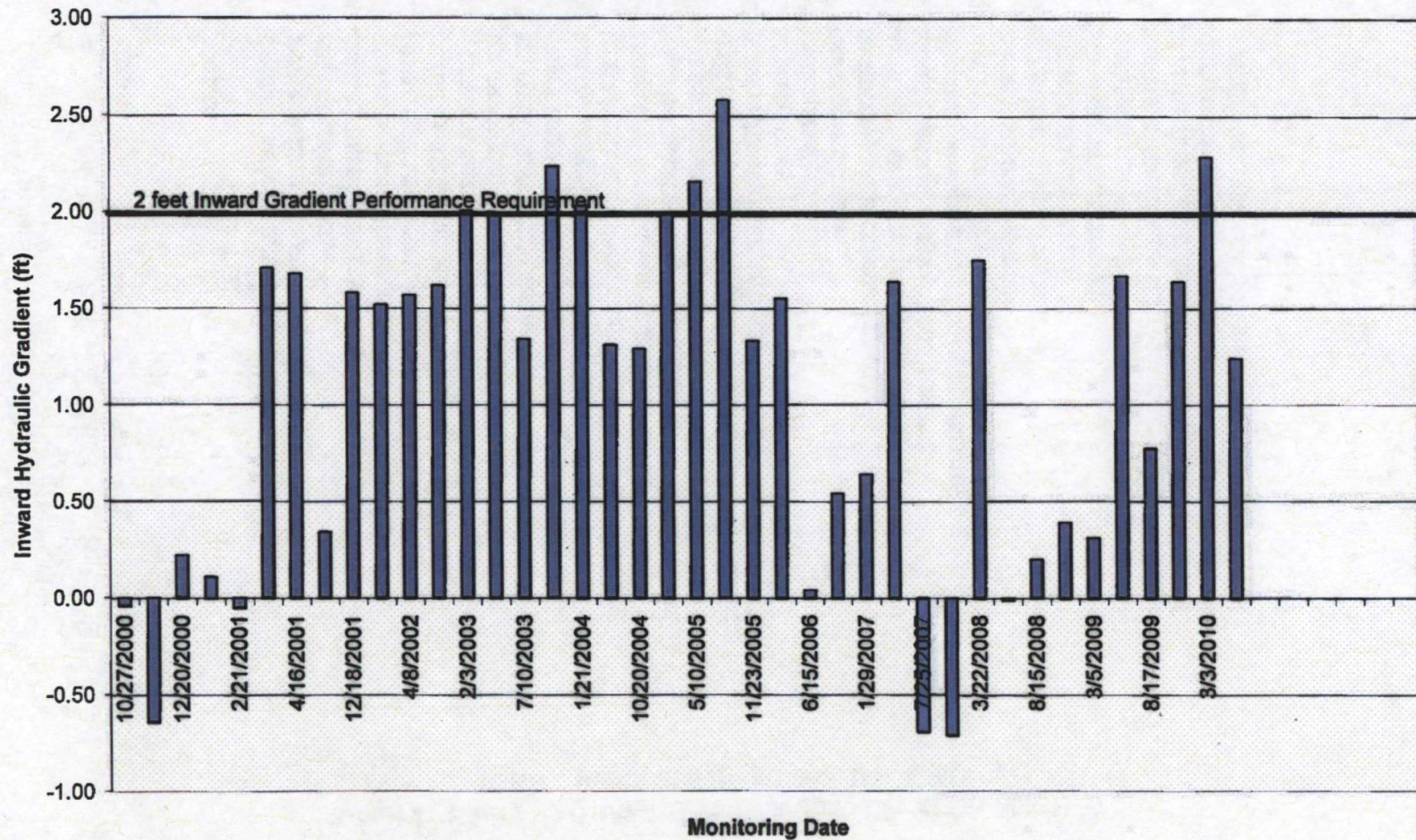
**Chart 2: Slurry Wall Inward Gradient Summary at GH-54/GH-55
G&H Landfill Superfund Site, Utica, MI**



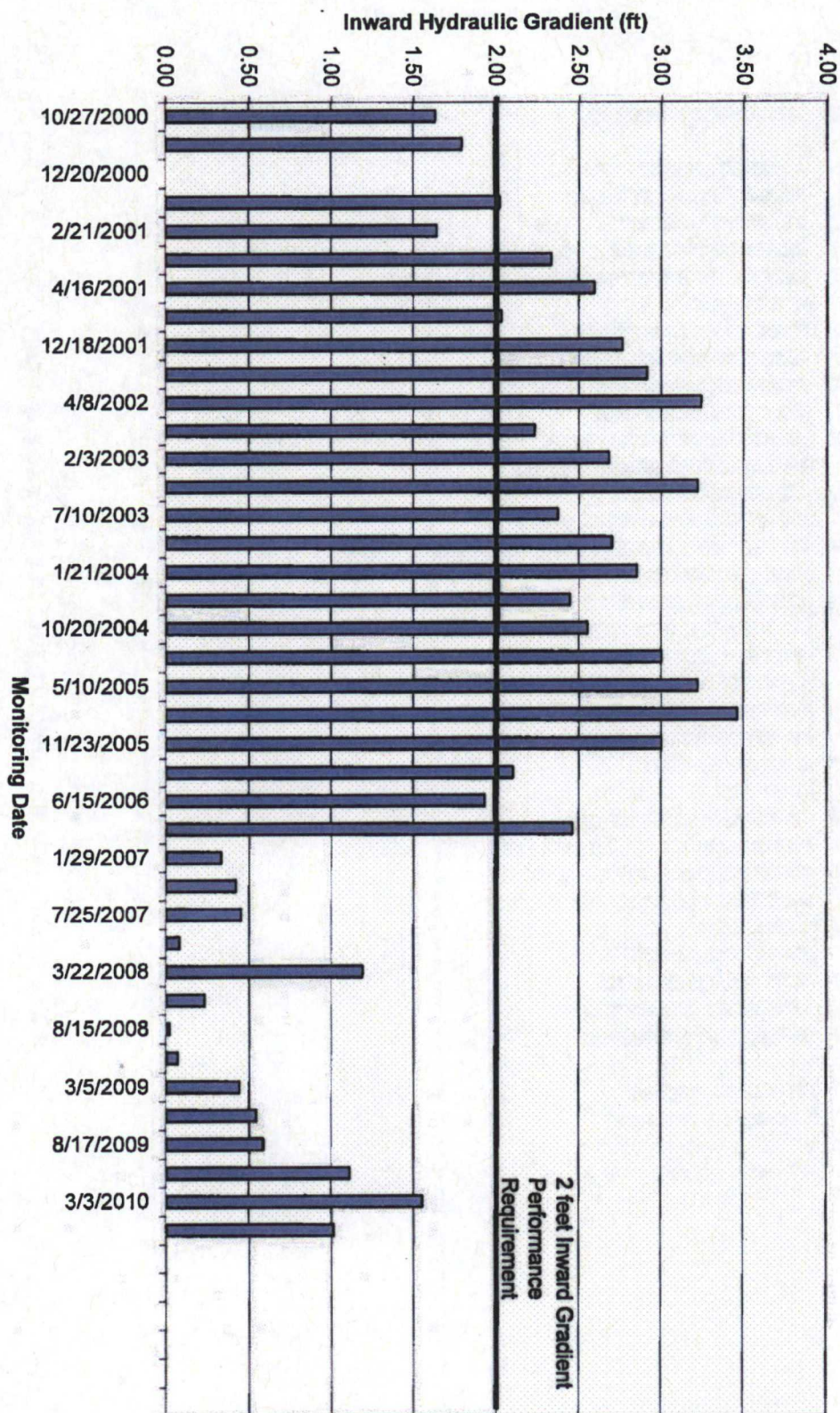
**Chart 3: Slurry Wall Inward Gradient Summary at GH-56/GH-57
G&H Landfill Superfund Site, Utica, MI**



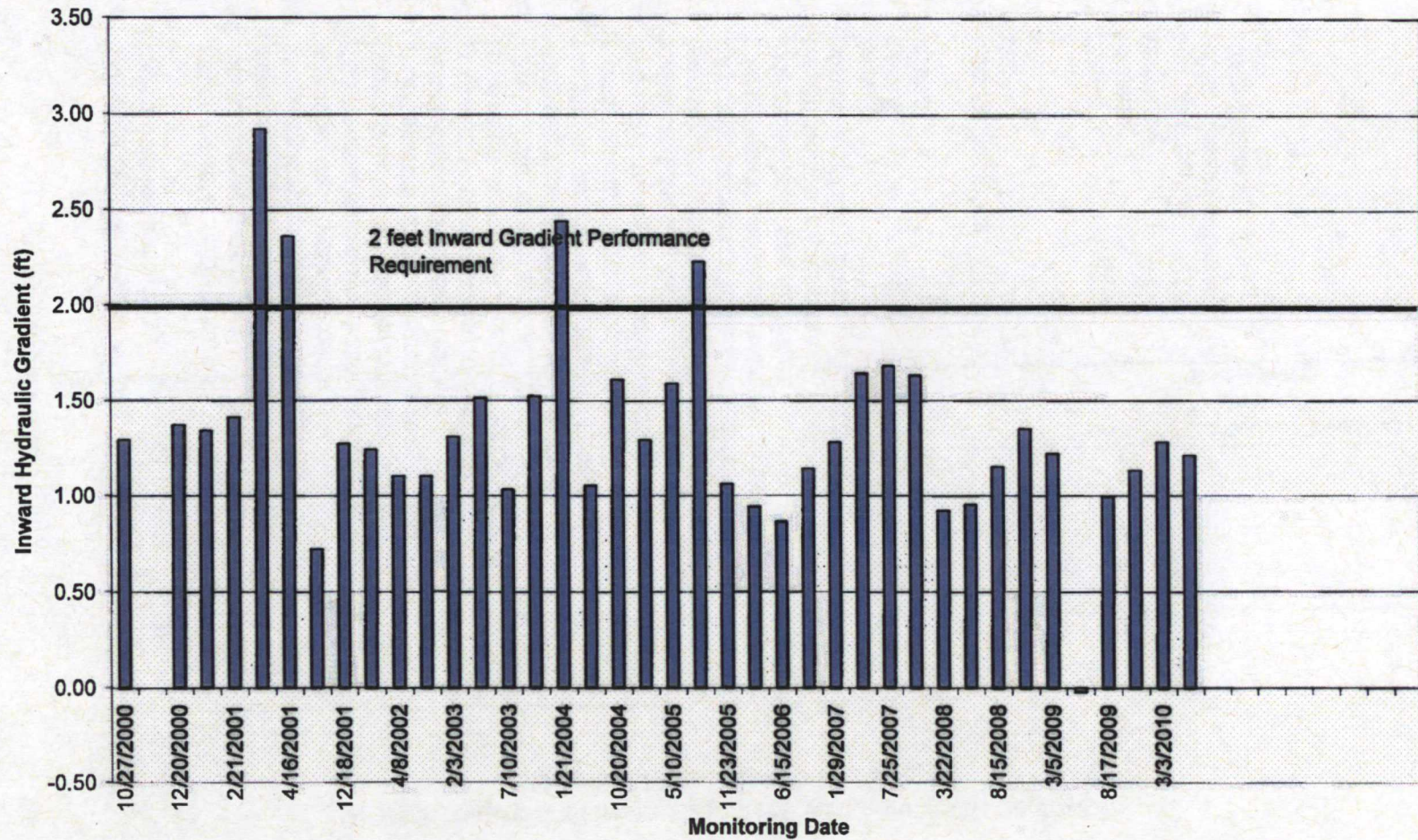
**Chart 4: Slurry Wall Inward Gradient Summary at GH-58/GH-59
G&H Landfill Superfund Site, Utica, MI**



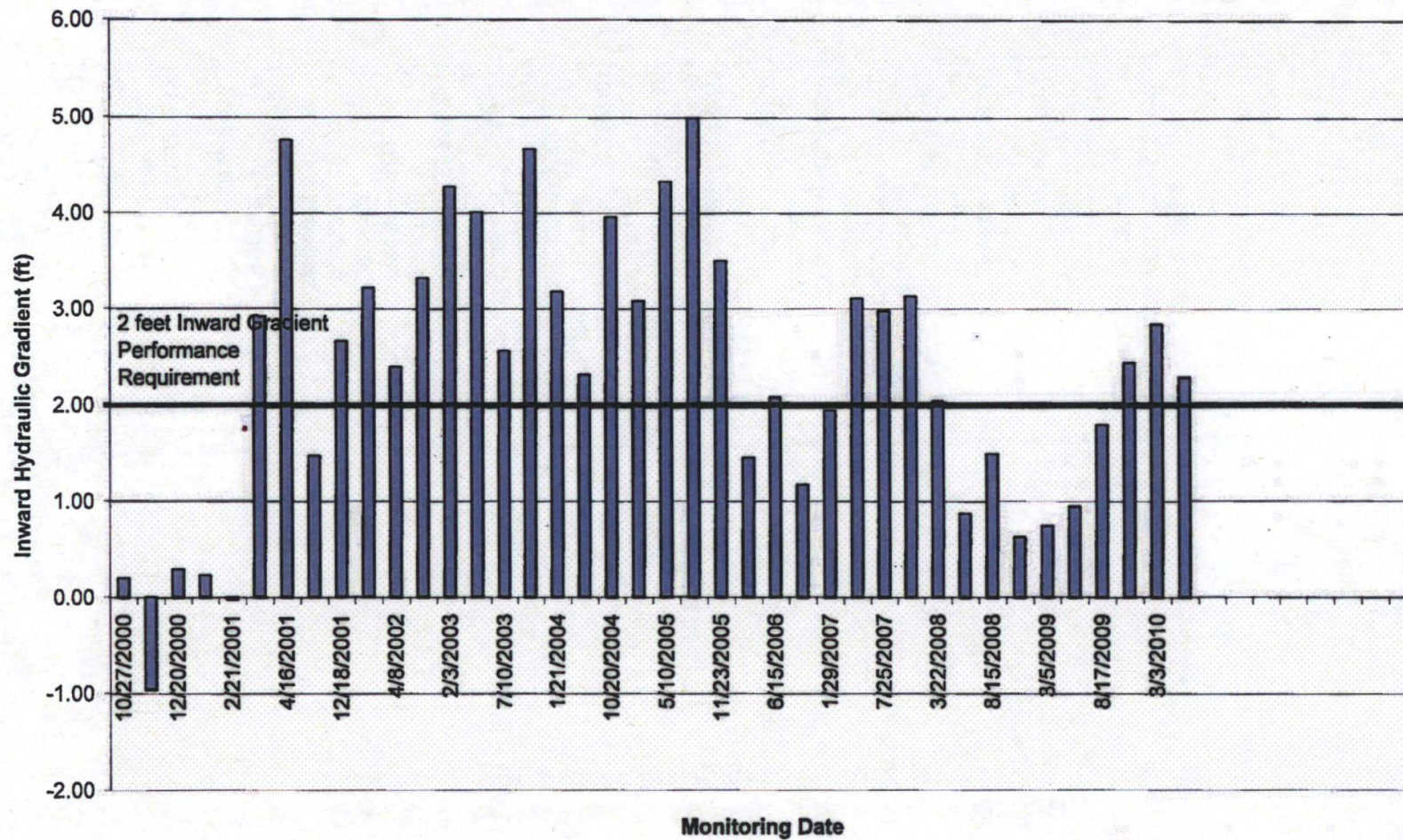
**Chart 5: Slurry Wall Inward Gradient Summary at GH-60/GH-61
G&H Landfill Superfund Site, Utica, MI**



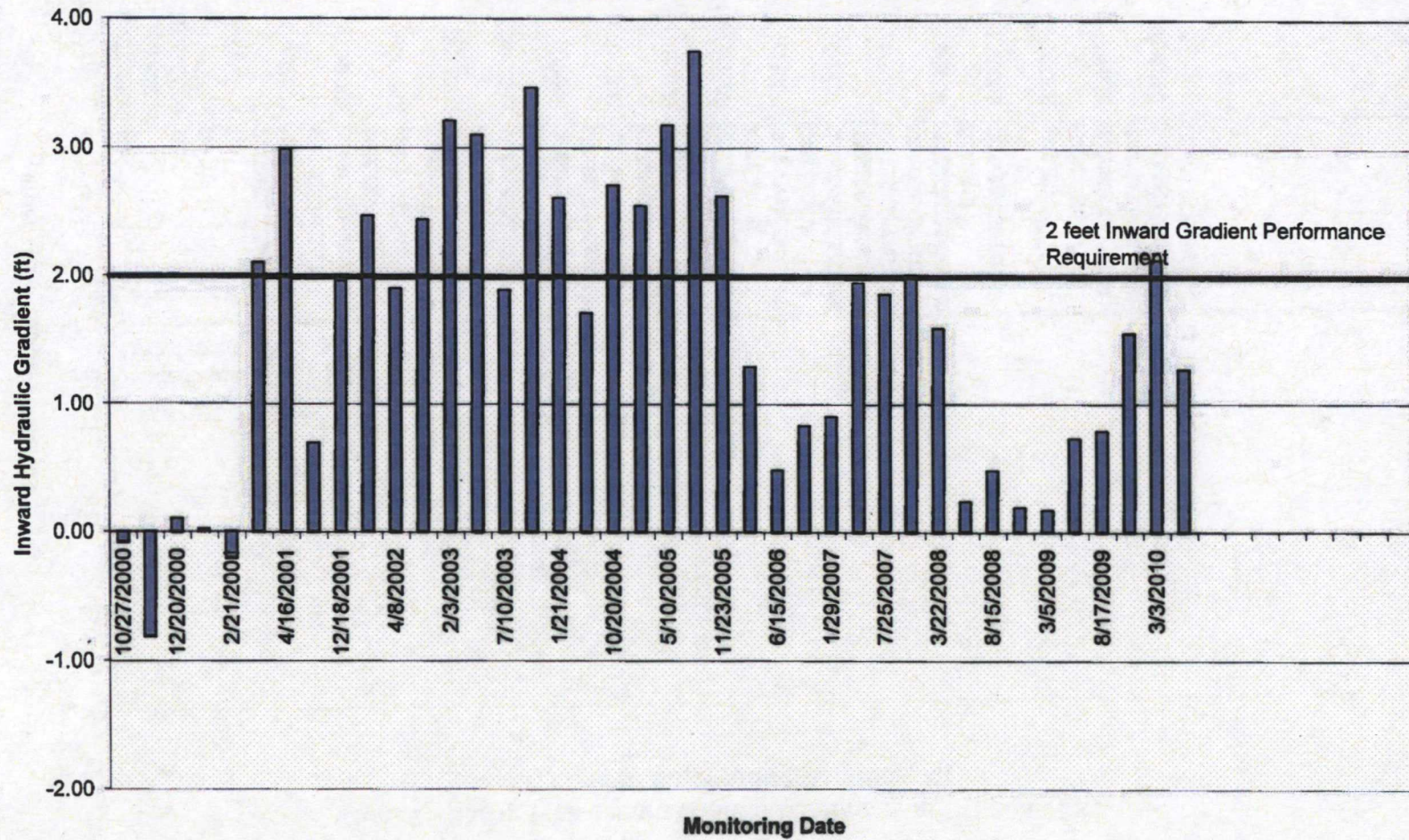
**Chart 6: Slurry Wall Inward Gradient Summary at GH-78/GH-79
G&H Landfill Superfund Site, Utica, MI**



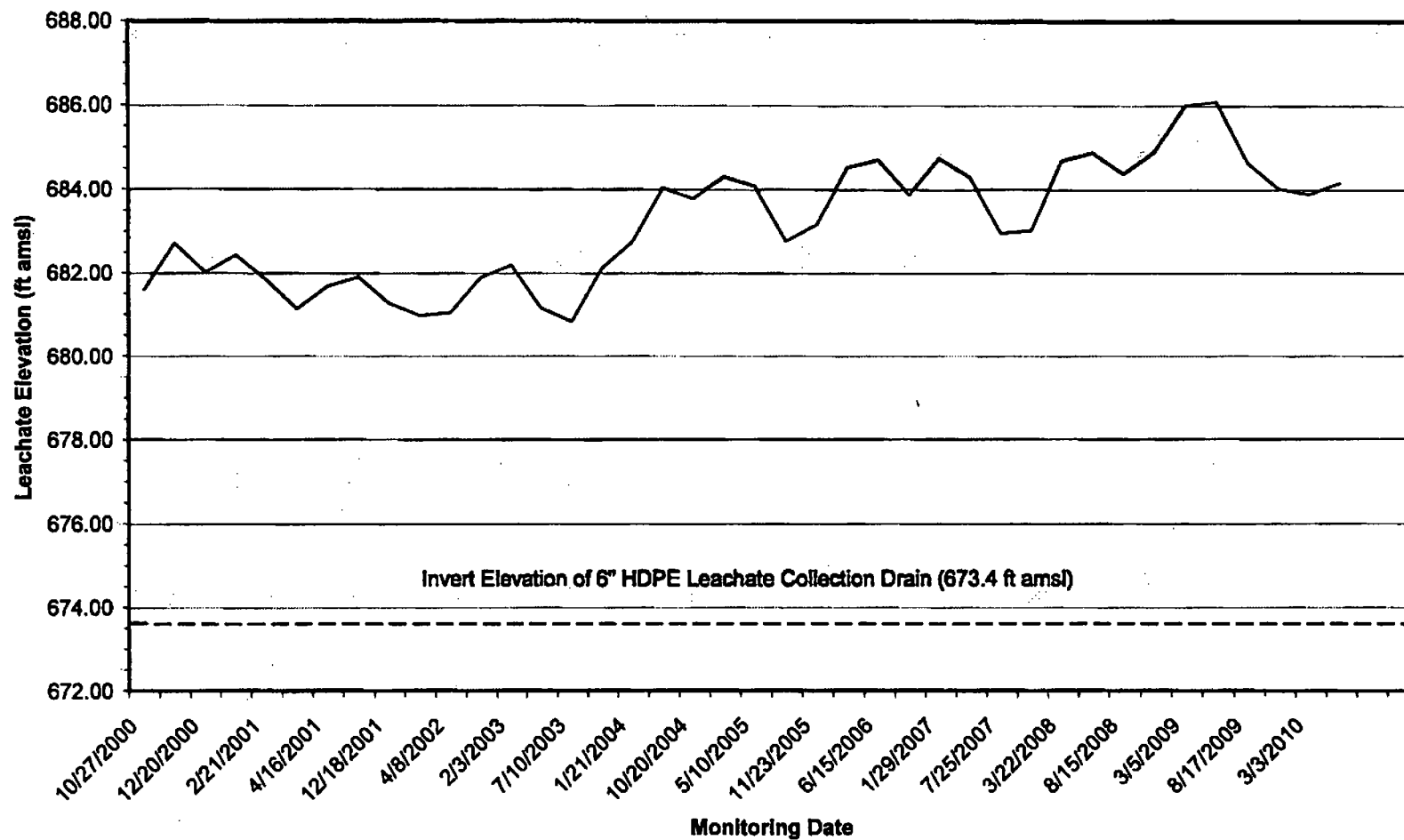
**Chart 7: Slurry Wall Inward Gradient Summary at GH-80/GH-81
G&H Landfill Superfund Site, Utica, MI**



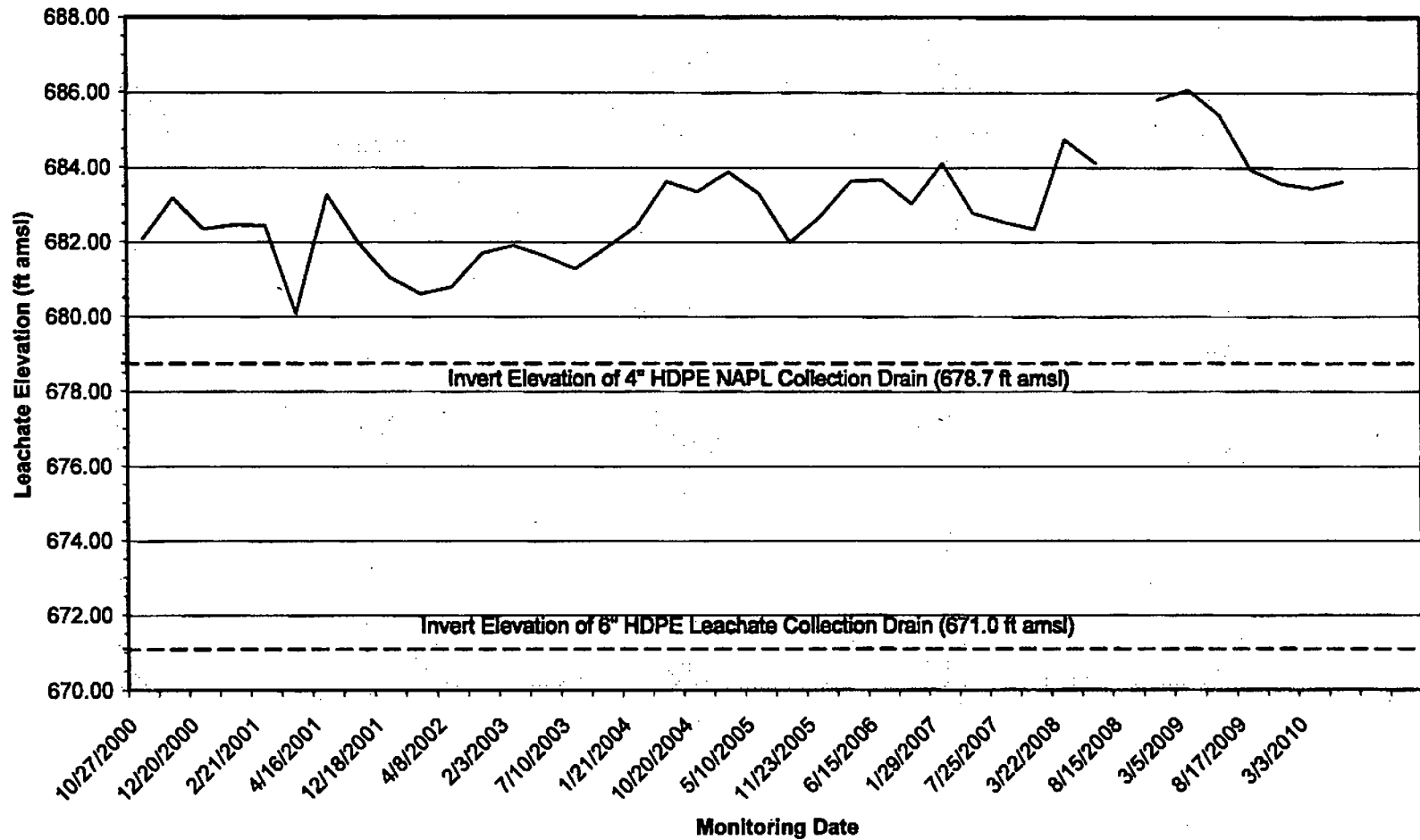
**Chart 8: Slurry Wall Inward Gradient Summary at GH-82/GH-83
G&H Landfill Superfund Site, Utica, MI**



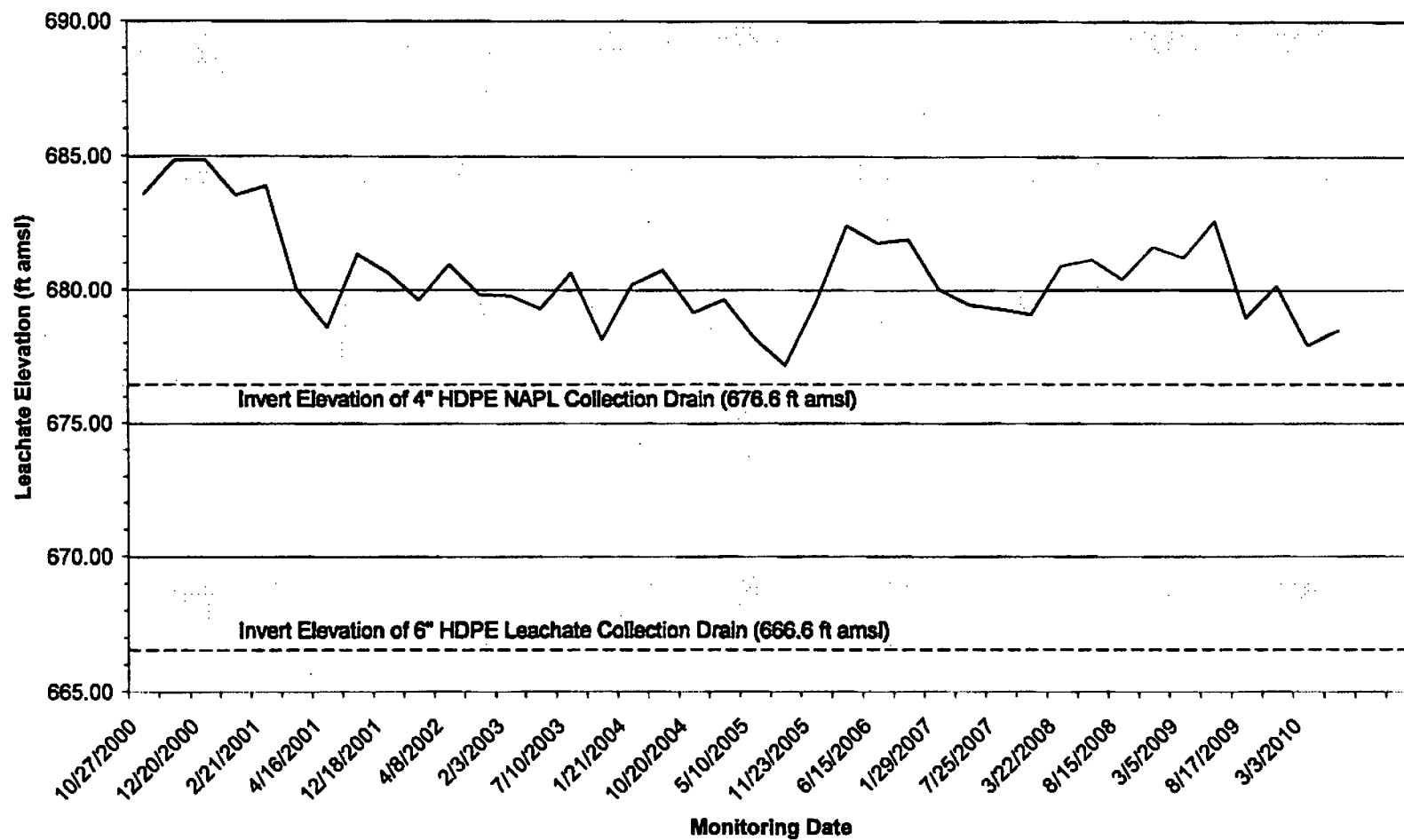
**Chart 9: G&H Landfill Superfund Site, Utica, MI
Leachate Elevation Inside Slurry Wall at GH-52**



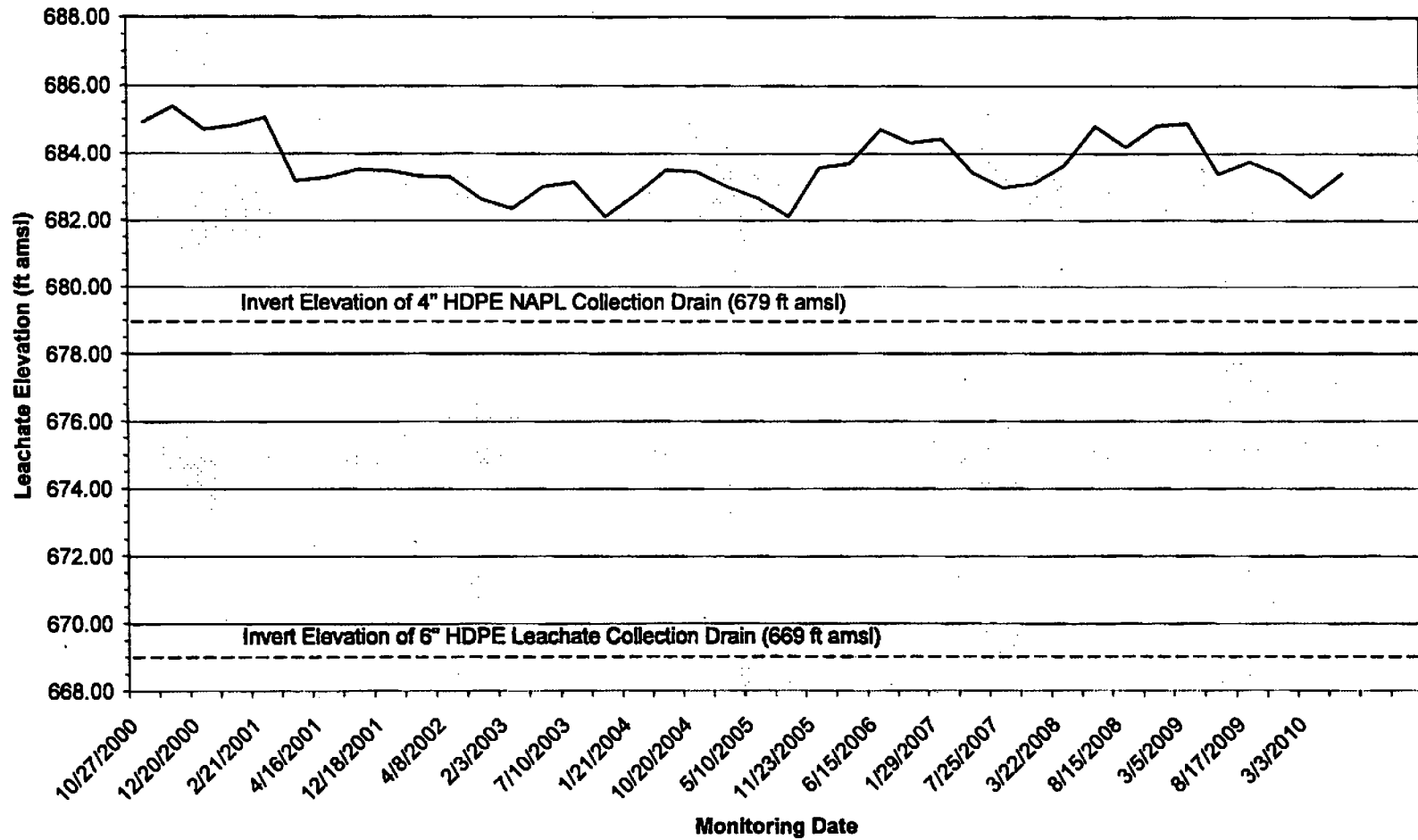
**Chart 10: G&H Landfill Superfund Site, Utica, MI
Leachate Elevation Inside Slurry Wall at GH-54**



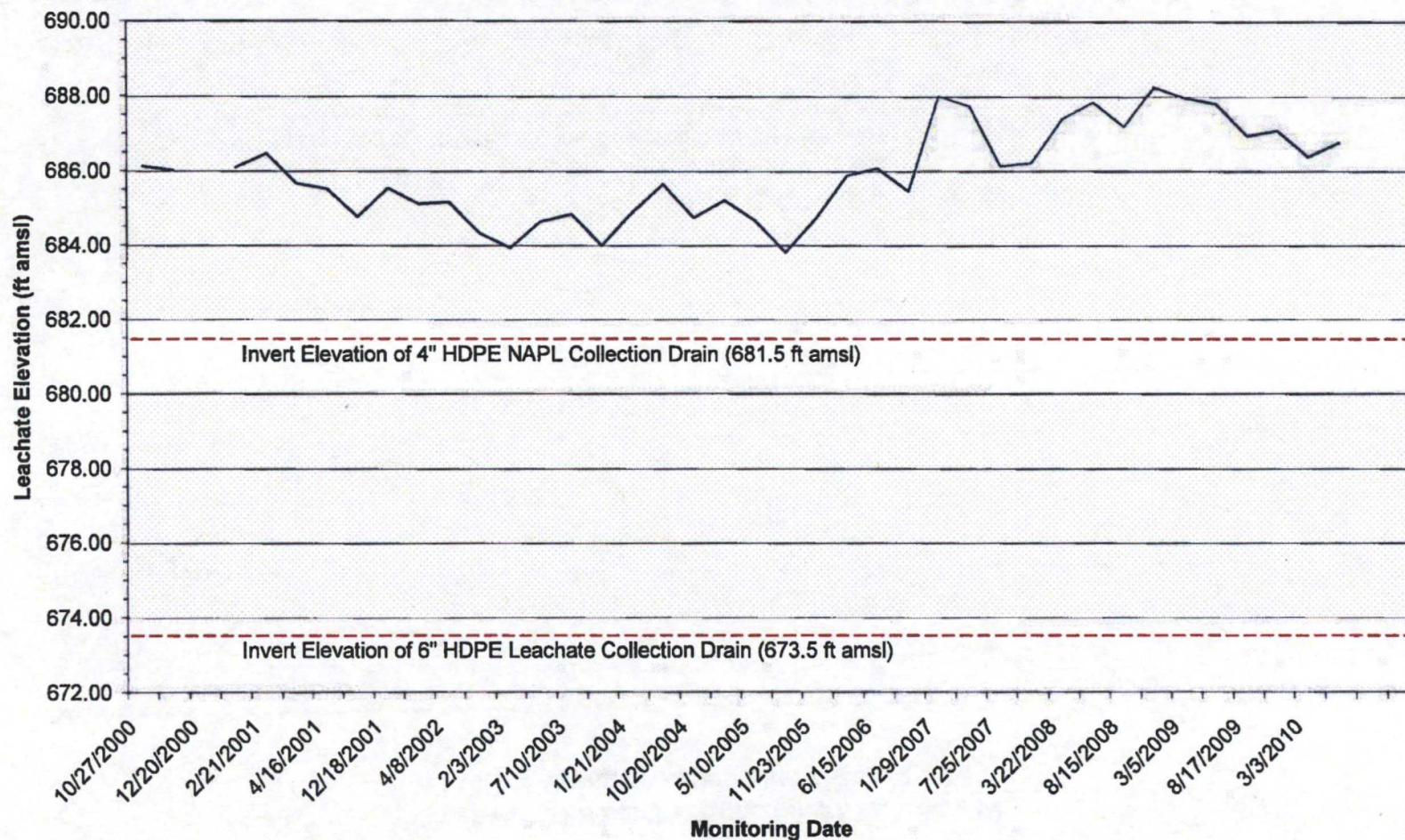
**Chart 11: G&H Landfill Superfund Site, Utica, MI
Leachate Elevation Inside Slurry Wall at GH-56**



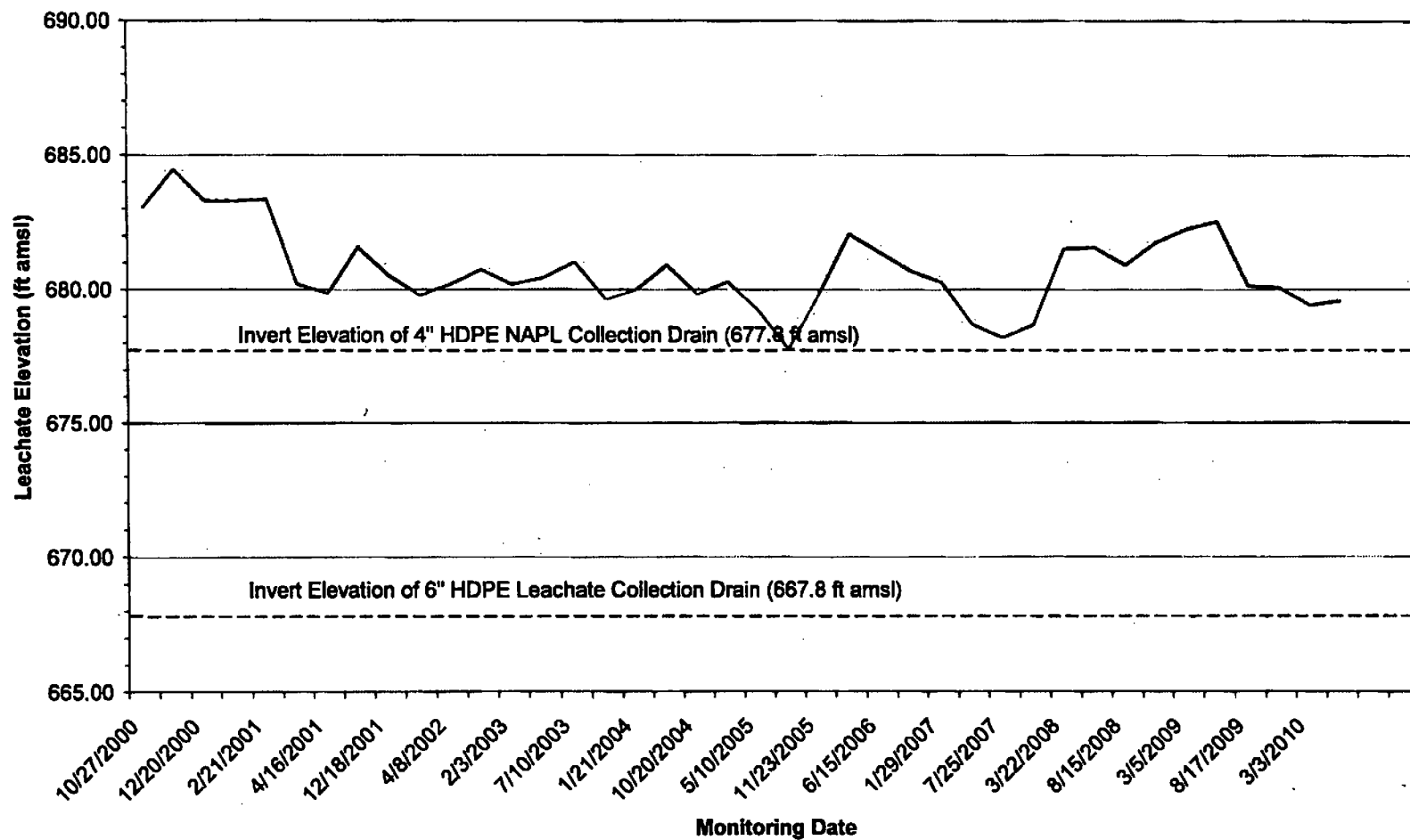
**Chart 12: G&H Landfill Superfund Site, Utica, MI
Leachate Elevation Inside Slurry Wall at GH-58**



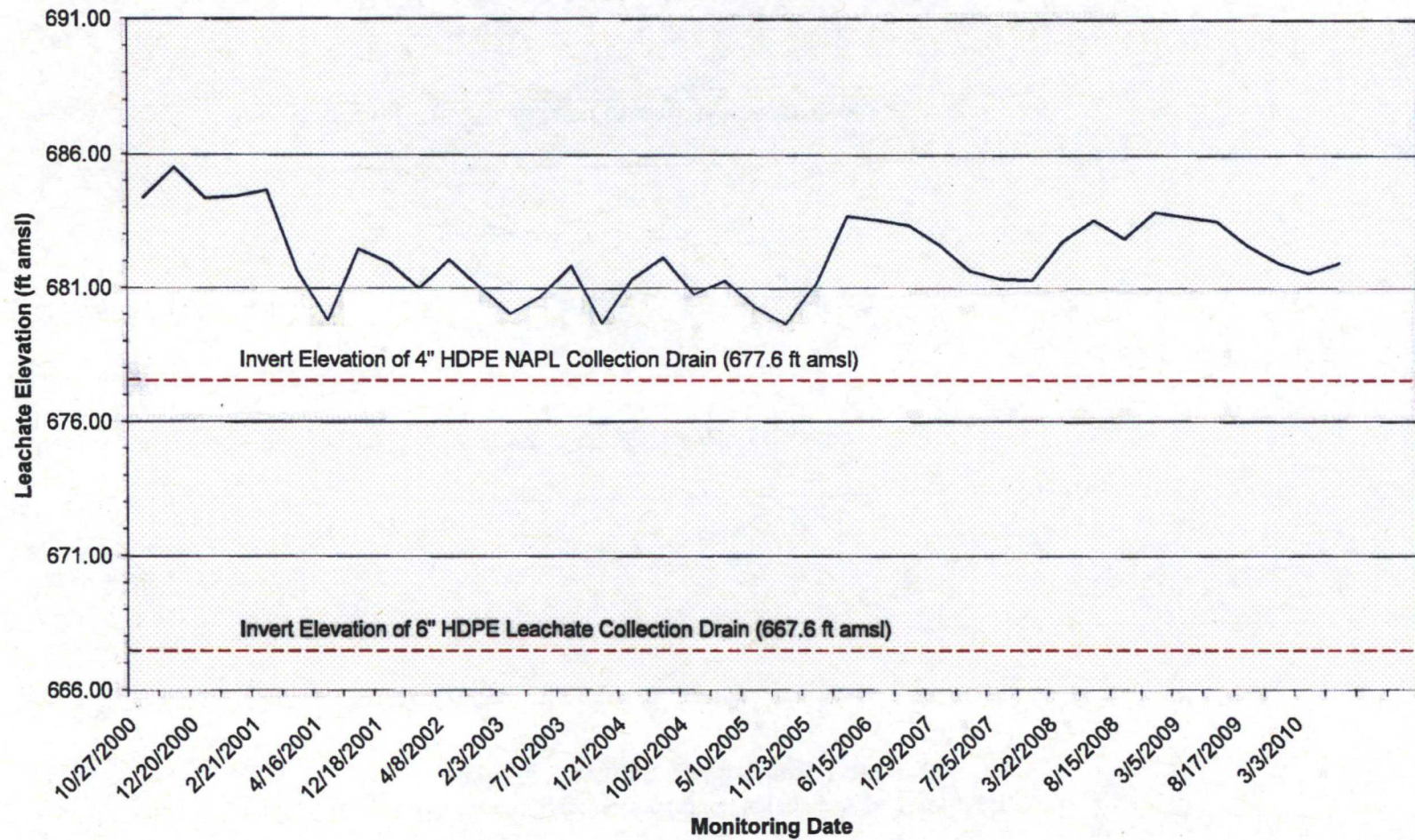
**Chart 13: G&H Landfill Superfund Site, Utica, MI
Leachate Elevation Inside Slurry Wall at GH-60**



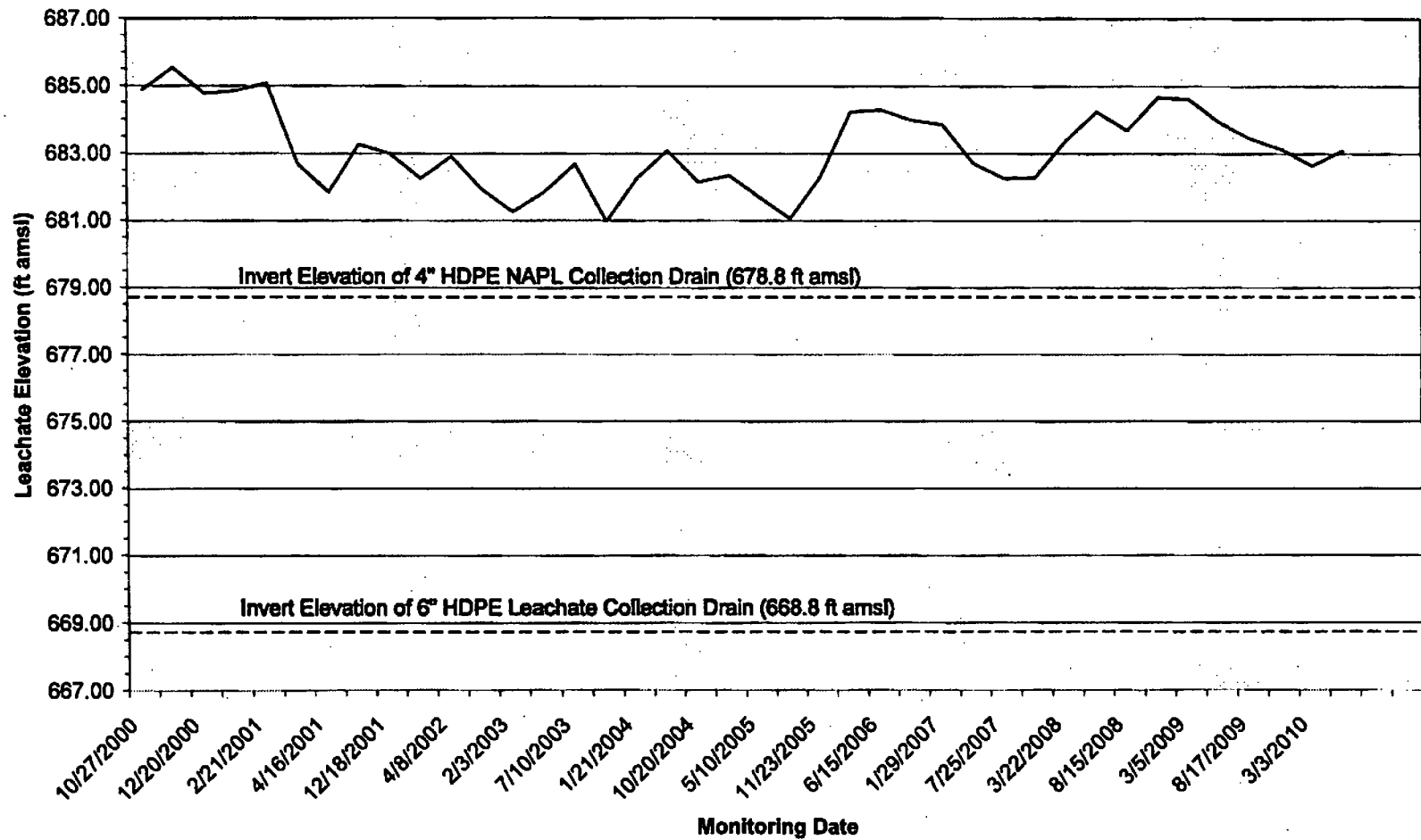
**Chart 14: G&H Landfill Superfund Site, Utica, MI
Leachate Elevation Inside Slurry Wall at GH-78**



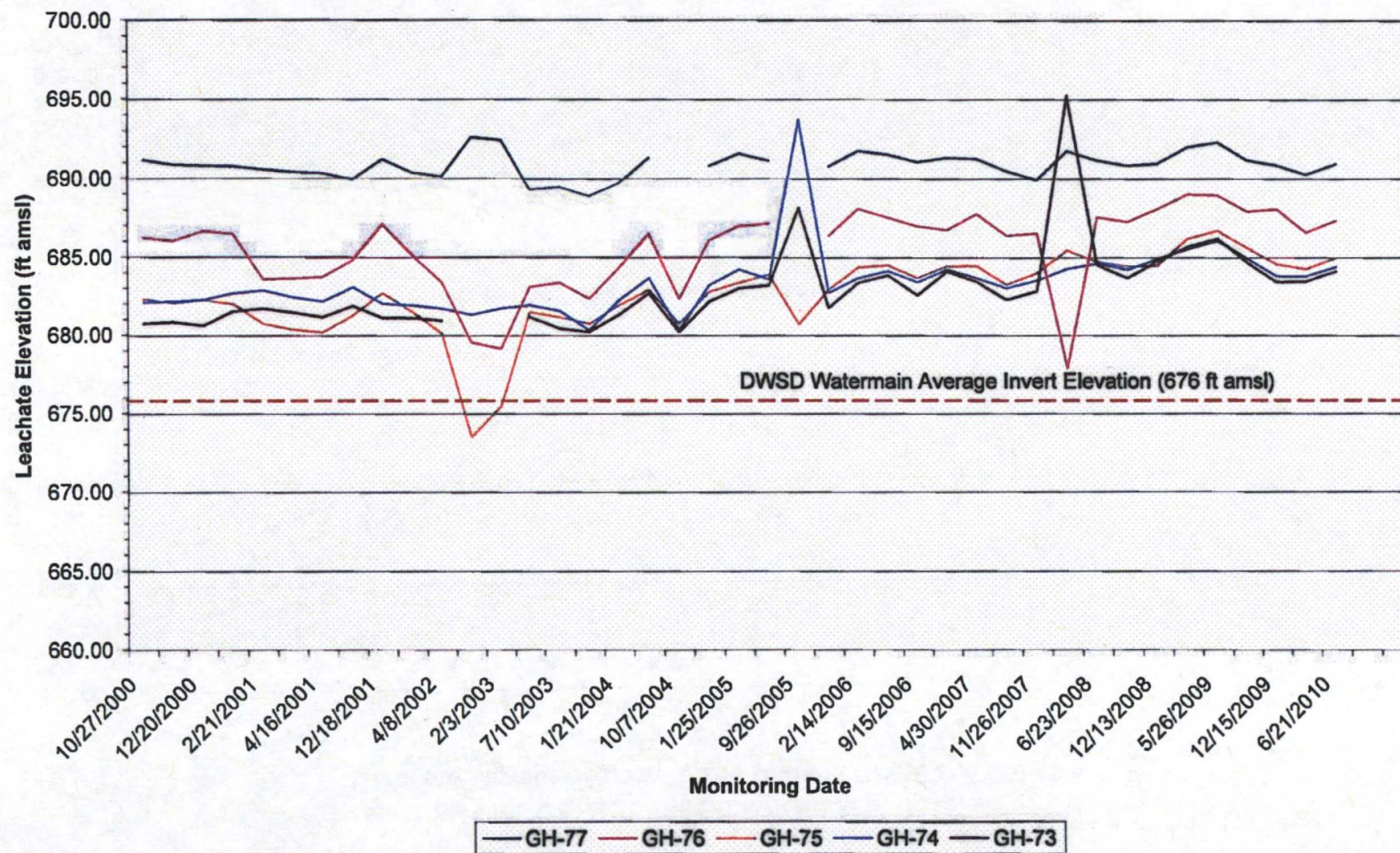
**Chart 15: G&H Landfill Superfund Site, Utica, MI
Leachate Elevation Inside Slurry Wall at GH-80**



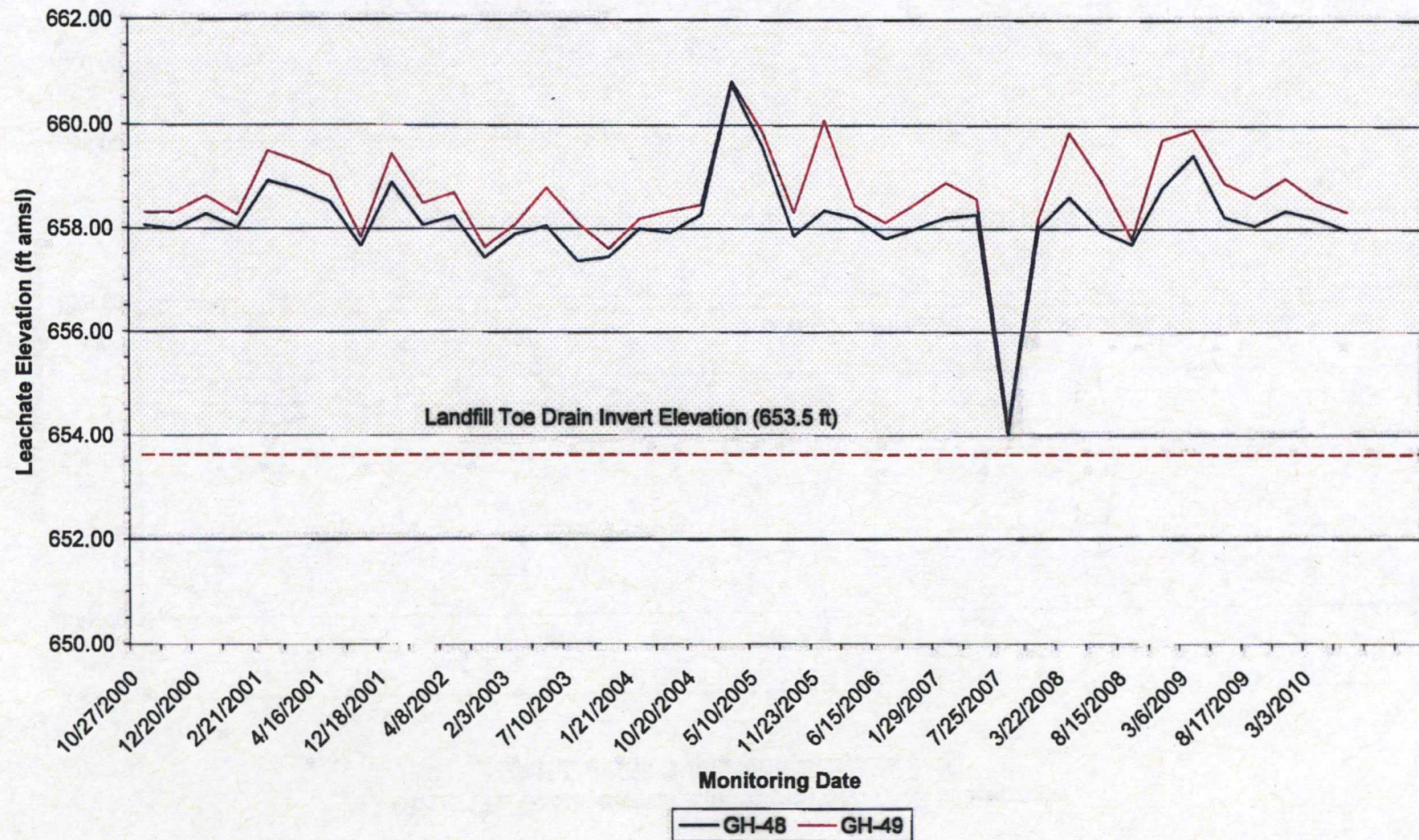
**Chart 16: G&H Landfill Superfund Site, Utica, MI
Leachate Elevation Inside Slurry Wall at GH-82**



**Chart 17: Groundwater Elevations at DWSD Watermain
G&H Landfill Superfund Site, Utica, MI**



**Chart 18: G&H Landfill Superfund Site, Utica, MI
Leachate Elevation Phase III Toe Drain at GH-48 and GH-49**



**Chart 19: G&H Landfill Superfund Site, Utica, MI
Leachate Elevation Phase III Toe Drain at GW-10**

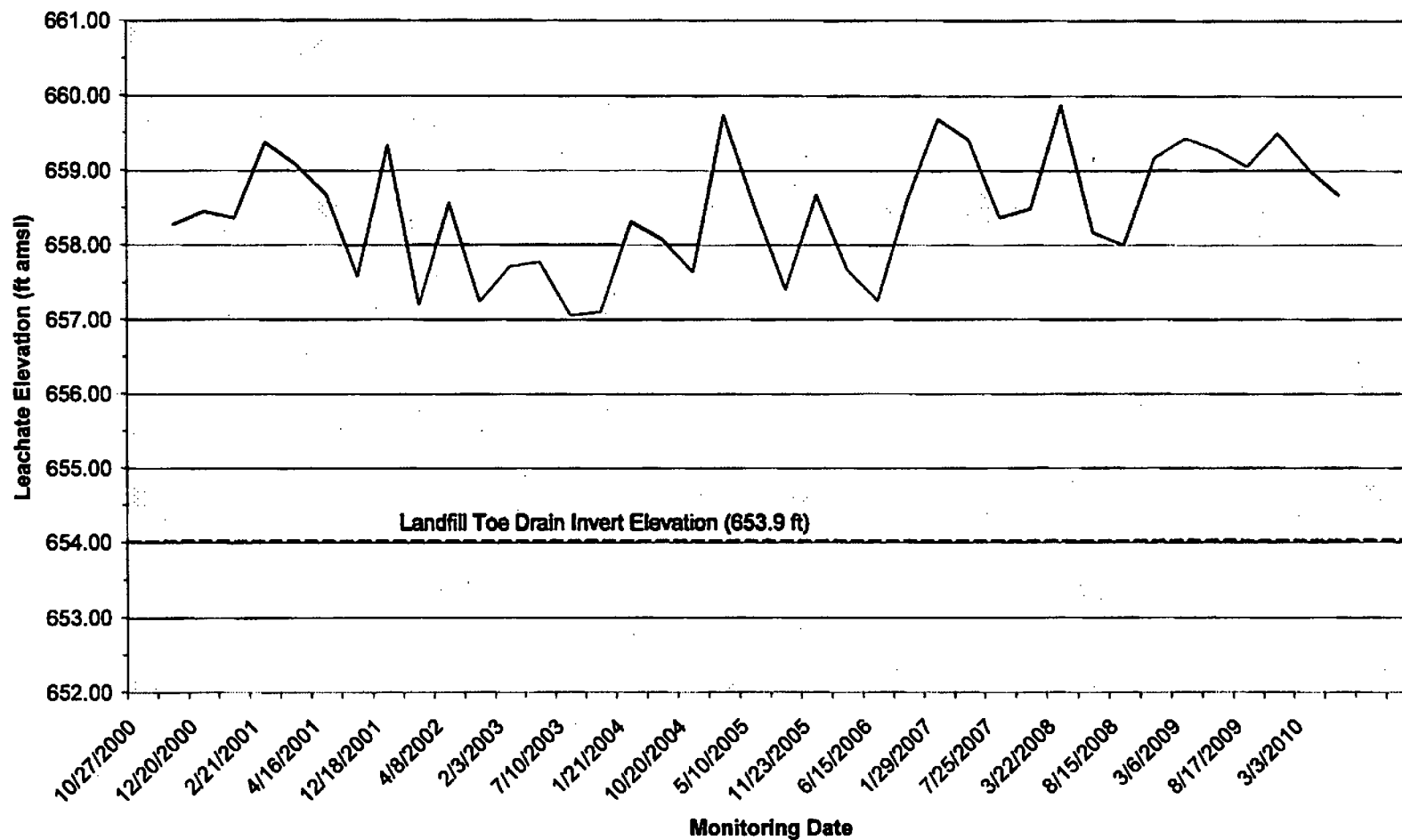


Table 1: Summary of Groundwater Detections
June 23, 2008 Sampling Event
G&H Landfill Superfund Site, Utica, Michigan

Compound	Units	Federal MCLs ¹	Federal MCLGs	Michigan Act 307 Criteria ²	Concentration Range ³	No. of Detections/ No. of Samples	Exceeds 10 ⁻⁶ Lifetime Cancer Risk	Exceeds Hazard Index of 1.0
VOCs								
1,1-Dichloroethane	ug/l	--	--	700	0.34 - 0.43	2/80	no	no
1,2-Dichlorobenzene	ug/l	600	600	600	0.27 - 0.29	1/49	no	no
1,2-Dichloroethane	ug/l	5	0	0.4	0.38 - 0.38	1/49	yes	no
1,3-Dichlorobenzene	ug/l	--	--	800	0.77 - 0.82	1/49	no	no
1,4-Dichlorobenzene	ug/l	75	75	1	0.75 - 3.6	2/49	yes	no
2-Butanone (Methyl Ethyl Ketone)	ug/l	--	--	400	0.6 - 13	6/49	no	no
Benzene	ug/l	5	0	1	0.44 - 6.3	8/60	yes	no
Carbon disulfide	ug/l	--	--	700	0.29 - 0.29	1/49	no	no
Chlorobenzene	ug/l	100	100	100	0.21 - 2.1	14/49	no	no
Chloroethane	ug/l	--	--	9	0.32 - 2.1	8/49	no	no
cis-1,2-Dichloroethene	ug/l	70	70	70	0.23 - 4.6	9/60	no	no
Dichlorodifluoromethane (CFC-12)	ug/l	--	--	1,000	0.6 - 0.6	1/49	no	no
Methyl Tert Butyl Ether	ug/l	--	--	500	0.23 - 0.23	1/49	no	no
trans-1,2-Dichloroethene	ug/l	100	100	100	0.2 - 0.39	2/60	no	no
Vinyl chloride	ug/l	2	0	0.02	0.23 - 8.6	4/60	yes	no
SVOCs								
4-Methylphenol	ug/l	--	--	400	1.2 - 610	4/49	no	yes
bis(2-Chloroethyl)ether	ug/l	--	--	0.03	0.23 - 0.52	2/49	yes	no
bis(2-Ethylhexyl)phthalate	ug/l	6	0	2	1 - 28	2/49	yes	no
N-Nitrosodiphenylamine	ug/l	--	--	--	0.47 - 0.47	1/49	no	no
Phenol	ug/l	--	--	4,000	290 - 290	1/49	no	yes
Metals								
Aluminum	mg/L	0.05 - 0.2 s	--	0.05 - 0.2	0.0202 - 0.458	16/49	no	no
Antimony	mg/L	0.006	0.006	0.003	0.00014 - 0.00018	4/49	no	yes
Arsenic	mg/L	0.01	0	0.00002	0.0037 - 0.136	48/60	yes	yes
Barium	mg/L	2	2	2	0.0183 - 0.508	60/60	no	no
Chromium Total	mg/L	0.1	0.1	0.1	0.0024 - 0.0453	7/49	no	no
Cobalt	mg/L	--	--	--	0.0021 - 0.0127	10/49	no	no
Copper	mg/L	1 s	--	1	0.0003 - 0.0036	32/49	no	no
Iron	mg/L	0.3 s	--	0.3	0.0845 - 40.1	46/49	no	yes
Lead	mg/L	0.015	0	--	0.0055 - 0.0112	3/60	no	no
Magnesium	mg/L	--	--	--	1.45 - 1.4	49/49	no	no
Manganese	mg/L	0.05 s	--	0.7, 0.05	0.00089 - 1.61	49/49	no	yes
Nickel	mg/L	--	--	0.01	0.0038 - 0.12	13/49	no	yes
Selenium	mg/L	0.05	0.05	0.04	0.007 - 0.007	1/49	no	no
Sodium	mg/L	--	--	150	9.81 - 369	49/49	no	yes
Thallium	mg/L	0.002	0.0005	0.0005	0.00017 - 0.00034	7/49	no	yes
Vanadium	mg/L	--	--	--	0.00076 - 0.0022	9/49	no	no
Zinc	mg/L	5 s	--	11.5	0.0592 - 4.52	9/49	no	yes
PCBs								
Aroclor-1254 (PCB-1254)	ug/l	0.0005	0	0.02	0.075 - 0.075	1/49	yes	yes
Pesticides								
alpha-BHC ³	ug/l	--	--	0.006	0.0086 - 0.02	3/49	yes	no
beta-BHC	ug/l	--	--	0.02	0.014 - 0.28	28/49	yes	no
delta-BHC	ug/l	--	--	--	0.026 - 0.19	4/49	yes	no
General Chemistry								
Alkalinity, Total (as CaCO ₃)	mg/L	--	--	--	140 - 1400	49/49	no	no
Cyanide (total)	mg/L	0.2	0.2	0.1	0.0062 - 0.37	9/49	no	yes
Sulfate	mg/L	250 s	--	250	0.2 - 346	49/49	no	no

Notes:

¹ U.S. EPA, 2003. List of Contaminants and their MCLs. EPA816-F-02-013, June.

² MERA Operational Memorandum #8, Revision 1 -- Type B Criteria Rules 299.5709, 299.5711(2), 299.5711(5) and 299.5713

³ Aesthetic Drinking Water Value

s = Secondary MCL

-- = Not Available

Exceeds federal and/or state criteria =

Attachment 5

Federal ARARs

The major ARARs that will be addressed and met by the selected remedy and whether the ARARs are listed as follows:

Executive Order 11988 and 11990; 40 CFR 6, Subpart A which requires that remedial actions must avoid adverse affects to floodplain or wetlands and evaluate potential impacts to these areas.

The Clean Air Act and 40 CFR 50 and 52 which require that select types and quantities of air emissions be in compliance with regional air pollution control programs; approved State Implementation Plans and other appropriate federal air criteria.

40 CFR 141 which requires that ground water used as drinking water meet maximum contaminant levels (MCLs) for pollutants of concern.

40 CFR 144 and 146 well plugging and abandonment and other requirements for the injection of treated ground water under the Underground Injection Control Program.

40 CFR 268 Land Disposal Restrictions for the handling, treatment, and placement of hazardous wastes.

49 CFR 107 requirements for transporting hazardous materials off-site.

40 CFR 761 TSCA regulations for the treatment, storage, and handling of PCBs.

Attachment 6

State ARARs

Act 60 of 1976 (PCB Compounds) which prohibits the disposal of waste containing a concentration equal or greater than 100 ppm of PCBs.

Act 64 of 1979 (The Hazardous Waste Management Act) which regulates the treatment, transport and disposal of hazardous wastes from site restoration.

Act 98 of 1913 (The Waterworks and Sewerage Systems Act) which are rules for construction and operation of sewerage systems, as applicable for discharge of ground water via new sewer connection and certification of the operator.

Act 127 of 1970 (The Michigan Environmental Protection Act) which prohibits any action which pollutes, impairs, or destroys the State's natural resources, due to any remedial action at the site.

Act 203 of 1979 (The Goemare-Anderson Wetland Protection Act) which regulates discharges to wetlands.

Act 245 of 1929 (The Water Resources Commission Act), as amended, which establishes surface water-quality standards to protect human health and the environment. The State administers the NPDES program under Part 21 of Michigan Act 245; therefore, Part 21 of Act 245 would be applicable to the direct discharge of treated water to the Clinton River or to a clean aquifer, to the indirect discharge through groundwater movement to a surface water body, or to discharge to a POTW.

Act 307 of 1990 (The Michigan Environmental Response Act) which provides for response activity to eliminate environmental contamination as sites containing hazardous substances and establishes cleanup standards.

Act 315 of 1969 (The Mineral Well Act) which establishes requirements for monitoring wells at the site.

Act 346 of 1972 (The Inland Taking and Streams Act), as amended, which regulates inland lakes and streams in the State.

Act 347 of 1972 (The Soil Erosion and Sedimentation control Act) which requires a soil erosion control measures at the site consistent with locally approved soil sedimentation and erosion control plans or rules.

Act 348 of 1965 (The Air Pollution Act) which requires air emissions to have 'non-injurious effects.'

Act 641 of 1978 (The Solid Waste Management Act) which establishes provisions governing the

regulation and management of solid waste.

Public Health Code Act 368 which establishes the procedures for well abandonment.



**G&H Landfill
Macomb County, MI**

MID980410823



Legend *

- | | |
|----------------------------------------|---------------------|
| PRP Site Boundary | Auto Disposal Yard |
| Estate of Leonard Forster | Watermain Easements |
| Deed Restrictions (1991) - Required IC | |



* Please see Attachment 8 for Summary of Institutional Controls

EPA Disclaimer: Please be advised that areas depicted in the map have been estimated. The map does not create any rights enforceable by any party. EPA may refine or change this data and map at any time.

Created by Sarah Backhouse
U.S. EPA Region 5 on 9/22/06

Attachment 7

Attachment 8 DEED RESTRICTIONS ON G & H LANDFILL SITE

The Estate of Leonard Forster, owner in fee simple of the real estate described below, hereby imposes restrictions on the described real estate, also known as the G & H Industrial Landfill Site (hereafter "the Site") in Shelby Township, Macomb County, State of Michigan:

Beginning at Northeast corner Section 19, Town 3 North, Range 12 East, thence South 993.3 feet; thence South 89 degrees 55 minutes West 792 feet; thence South 220 feet; thence North 89 degrees 55 minutes East 396 feet; thence South 412.23 feet to R/W Michigan Central Railroad; thence Northwesterly along Railroad to South line of North 1/2 of North 1/2; thence West along 1/8 line to center line of Clinton River thence Northwesterly along River to North line of Section; thence East along Section line to point of beginning; except Michigan Central Railroad R/W. Subject to a 12 foot watermain easement, the center line description as, beginning at a point South 40 feet and West 30 feet from Northeast corner Section 19, thence West 1370 feet to the point ending, along with a 20 foot watermain easement, the center line description as beginning 1370 feet West of Northeast corner Section 19; thence South 34 feet to point of ending.

The restrictions enumerated herein also apply to the specific portion of the Site known as the Auto Disposal Yard, or Junkyard, bordered immediately to the northeast by the intersection of 23-Mile Road and Ryan in Shelby Township, Macomb County, Michigan. The legal description of the Auto Disposal Yard is:

Beginning at the N.E. Corner of Section 19, T.3N., R.12E., Shelby Township, Macomb County, Michigan; thence Due South 993.30 feet along the East line of Section 19 and the centerline of Ryan Road; thence S.89°55'00"W., 400.00 feet; thence Due North, 990.51 feet to a point on the North line of Section 19; thence N.89°31'01"E., 400.01 feet along the North line of Section 19 and the centerline of 23 Mile Road to the Point of Beginning and containing 9.11 acres.

The following restrictions are imposed upon the Site, its present and any future owners (including the heirs to the Estate) their authorized agents, assigns, employees or persons acting under their direction or control, for the purposes of protecting public health or welfare and the environment, preventing interference with the performance, and the maintenance, of any response actions selected and/or undertaken by the United States Environmental Protection Agency ("U. S. EPA"), or any party acting as agent for U.S. EPA, pursuant to Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"). Specifically, the following deed restrictions shall apply to the Site as provided for in paragraph nine (9) of the Consent Decree:

1. There shall be no consumptive or other use of the groundwater underlying the Site that could cause exposure of humans or animals to the groundwater underlying the Site;
2. There shall be no residential, commercial, or agricultural use of the Forster property considered part of the Site, including, but not limited to, any filling, grading, excavating,

building, drilling, mining, farming, or other development, or placing of waste material at any portion of the Site, including, but not limited to, the Auto Disposal Yard as described above, for any purpose, including residential, commercial, or agricultural purposes, except as approved in writing, by U.S. EPA;

3. There shall be no use of the Site that would allow the continued presence of humans at the Site, other than the presence necessary for implementation of any response actions selected and/or undertaken by U.S. EPA pursuant to Section 104 of CERCLA, including such response actions taken by other responsible parties under a judicial or administrative order. A prohibited use of the Site includes, but is not limited to, recreational use;

4. There shall be no installation, removal, construction or use of any buildings, wells, pipes, roads, ditches or any other structures or materials at the Site except as approved, in writing, by U.S. EPA, and in consultation with the State of Michigan;

5. There shall be no tampering with, or-removal of, the containment or monitoring systems that remain on the Site as a result of implementation of any response action by U.S. EPA, or any party acting as agent for U.S. EPA, and which is selected and/or undertaken by U.S. EPA pursuant to Section 104 of CERCLA; and

6. There shall be no use of, or activity at, the Site that may interfere with, damage, or otherwise impair the effectiveness of any response action (or any component thereof) selected and/or undertaken by U.S. EPA, or any party acting as agent for U.S. EPA, pursuant to Section 104 of CERCLA, except with the written approval of U.S. EPA, in consultation with the State of Michigan, and consistent with all statutory and regulatory requirements.

The obligation to implement and maintain the above restrictions shall run with the land and shall remain in effect until such time as U.S. EPA files with the Court a written certification stating:

1. The response action required at, under or adjacent to the Site by any Consent Decree or judicial or administrative order, entered pursuant to CERCLA, has been fully implemented;

2. No other response actions are planned for the Site; and

3. The above restrictions are no longer necessary to meet the purposes of this Decree.

Attachment 9 - Detailed Instructions for the Institutional Controls Investigation

Grant P. Gilezan
Dykema
400 Renaissance Center
Detroit, MI 48243

**Re: G&H Landfill Superfund Site
Institutional Controls Investigation
Shelby Township, MI
Civil Action No. 92-CV-75460**

Dear Mr. Gilezan:

The United States Environmental Protection Agency (EPA) is conducting an evaluation of institutional controls (ICs) at Superfund sites in conjunction with Five-Year Reviews (FYRs). ICs are needed at sites where on-site hazardous substances remain above levels that allow for unlimited use and unrestricted exposure (UU/UE). ICs may also be necessary to prevent interference with Superfund remedy components. EPA's *Strategy to Ensure Institutional Control Implementation at Superfund Sites* can be found at <http://www.epa.gov/superfund/policy/ic/strategy.htm>.

Specifically, this letter requests your assistance in evaluating ICs for the G&H Landfill Superfund Site. EPA is asking that you conduct an IC investigation within six months after completion of the 2011 FYR Report, which should be signed by the Division Director on or before June 27, 2011. The institutional controls investigation needs to determine: 1) whether the deed restrictions for the site were actually put in place by a person with authority to make the conveyance, 2) whether the deed restrictions are currently valid and have not been lifted or superseded, 3) whether the terms of the deed restrictions create rights that can be enforced by EPA or MDEQ in the event that the deed restrictions are violated, and 4) whether the deed restrictions are being complied with.

The IC investigation will be used by EPA to fulfill the requirements of the 2011 Five-Year Review of the Site pursuant to Section 121 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9621(c), which mandates that EPA review remedial actions where hazardous substances, pollutants, or contaminants remain in place to ensure that human health and the environment are being protected by the remedial action. The long term protectiveness of the remedy depends on compliance with ICs. The consent decree requires that the following restrictions be imposed upon the site for the purposes of protecting public health and the environment and preventing interference with the remedy:

- No consumptive or other use of the groundwater that could cause exposure of humans or animals to the groundwater underlying the site.
- No residential, commercial, or agricultural use of the Forster property considered part of the site, including, but not limited to, any filling, grading, excavating, building, drilling,

mining, farming, or other development, or placing of waste material at any portion of the site, including, but not limited to, the Auto Disposal Yard as described above, for any purpose, including residential, commercial, or agricultural purposes, except as approved in writing, by EPA.

- No use of the site that would allow the continued presence of humans at the site, other than the presence necessary for implementation of any response actions selected and/or undertaken by EPA pursuant to Section 104 of CERCLA, including such response actions taken by other responsible parties under a judicial or administrative order. A prohibited use of the site includes, but is not limited to, recreational use.
- No installation, removal, construction or use of any buildings, wells, pipes, roads, ditches or any other structures or materials at the site except as approved, in writing, by EPA, and in consultation with the State of Michigan.
- No tampering with, or-removal of, the containment or monitoring systems that remain on the site as a result of implementation of any response action by EPA, or any party acting as agent for EPA, and which is selected and/or undertaken by EPA pursuant to Section 104 of CERCLA.

No use of, or activity at, the site that may interfere with, damage, or otherwise impair the effectiveness of any response action (or any component thereof) selected and/or undertaken by EPA, or any party acting as agent for EPA, pursuant to Section 104 of CERCLA, except with the written approval of EPA, in consultation with the State of Michigan, and consistent with all statutory and regulatory requirements. The obligation to implement and maintain the above restrictions shall run with the land and shall remain in effect until such time as EPA files with the Court a written certification stating:

- The response action required at, under or adjacent to the site by any Consent Decree or judicial or administrative order, entered pursuant to CERCLA, has been fully implemented.
- No other response actions are planned for the site.
- The above restrictions are no longer necessary to meet the purposes of the remedy.

The goal of the IC investigation is to: a) evaluate whether institutional controls currently exist that adequately implement the objectives/performance standards described above; b) identify and recommend any corrective measures to existing ICs necessary for their effectiveness; and c) recommend any new or additional ICs necessary to achieve and maintain the objectives described above.

IC Study Report requirements

Within six months after completion of the 2011 Five-Year Review (FYR) Report please submit a draft IC investigation report to EPA that includes the following components:

1. Demonstration that existing proprietary controls have been properly recorded and are free and clear of all liens and encumbrances: Such a demonstration should include the

effective in the short term in maintaining the objectives of protecting human health and the environment and preventing interference with Superfund remedy components. Assess whether the controls will be effective in the long term in maintaining these objectives. Discuss whether existing ICs are preventing exposure. Discuss whether land and/or resource use has changed since execution of the ROD, and please provide answers to the following questions:

- Is current or expected land use consistent with the City or County Master Plan?
- Does the property owner have any plans to sell or transfer the property?
- Are there any new developments, either constructed or planned, in the area?
- Are there any new construction permits pending?
- If so, what are the plans regarding property's ICs?
- How are current land and resource uses related to the exposure assumptions and risk calculations?
- Are any unintended consequences resulting from a particular restriction?

8. Recommendations: For both proprietary and governmental controls propose any corrections to existing institutional controls that are necessary to ensure that the land and groundwater use restrictions described above are implemented correctly, are maintained, and will be protective in the short term and the long term. Propose controls for remaining areas that do not support unlimited use and unrestricted exposure but are not covered by existing controls and include a title commitment for any proposed proprietary control. Propose subrogation agreements for any encumbrance that impacts restricted areas. Propose monitoring requirements and modifications to the Operation and Maintenance Plan to ensure that ICs are maintained and complied with in the short term and in the long term. The monitoring plan must include a schedule and an annual certification to EPA that ICs are in place and remain effective.

If you have any technical questions concerning this request, please contact me at 312-353-4374. If you have any legal questions concerning this request, please contact Associate Regional Counsel Jeffrey Cahn at 312-886-6670.

following: a) a title insurance commitment using ALTA Commitment form 1982 as amended "for information only purposes" by a title company; b) copies of documents referenced in the title commitment; c) copies of the existing proprietary controls showing the recording stamp; d) copies of encumbrances, utility rights of way, leases, and subleases impacting restricted areas; e) map and GIS information that identifies parcel numbers and boundaries of current encumbrances (such as utility easements) that impact restricted areas; and f) copies of subrogation agreements for encumbrances.

2. Demonstration that existing proprietary controls were signed by a person or entity that owned the property at the time of signature.

3. Demonstration that governmental controls are currently in effect: Provide a current, dated and official copy of existing governmental controls (ordinance, statutes etc.) that implement the IC objectives for the restricted areas described above. Discuss any sunset provisions in the governmental controls.

4. Evaluation of whether existing controls cover the entire area needing restrictions: This evaluation should include a discussion of information used to depict the restricted areas and up to date information, data, and maps. Maps and accompanying GIS information must identify site boundaries, streets, property ownership and assessor's parcel numbers or other plat or survey information. For GIS analyses please provide an ESRI polygon-shape file projected in the UTM, NAD 83 projection system. Please identify the UTM zone and provide an attribute name in the shape file for each polygon. For example: "site boundary," "residential use prohibited," "groundwater use prohibited," and "interference with landfill cap prohibited".

5. An assessment of objectives, restrictions and performance standards of the ICs.

6. An assessment of monitoring and compliance with ICs: Discuss how, when, and by whom compliance with the institutional controls is monitored. Discuss whether the results of the IC monitoring are routinely and promptly shared with EPA and the State. Discuss whether there are measures in place to ensure that modifications to the restrictions require EPA and the State approval. Does EPA have a Memorandum of Understanding with the governmental entity? Discuss whether the property is being used in a manner consistent with the restrictions. In a summary of the results of site inspections and interviews with interested parties, please provide answers to the following questions:

- Are owners, lessees and other property holders aware of and complying with the restrictions?
- Where can interested parties obtain information about the governmental controls?
- Do the affected parties understand the restrictions described above?
- Have there been breaches of use restrictions described above?
- If there have been breaches of use restrictions, how were these addressed?

7. A discussion of the effectiveness of ICs for both proprietary and governmental controls: For proprietary controls discuss whether they are binding on subsequent property owners under applicable state law. For both proprietary and governmental controls, assess whether they are